

STATE OF MONTANA  
Department of Environmental Quality  
Helena, Montana 59620



**AIR QUALITY OPERATING PERMIT OP2667-01**

Issued to: **Plum Creek Manufacturing, L.P.**  
**P.O. Box 1990**  
**Columbia Falls, MT 59912-1990**

Final Date: **September 11, 2003**  
Expiration Date: **January 13, 2004**

Effective Date: **September 11, 2003**  
Date of Decision: **August 11, 2003**  
End of EPA 45-day Review: **August 7, 2003**  
Proposed Issue Date: **June 19, 2003**  
Draft Issue Date: **February 7, 2003**

Application Deemed Technically Complete: **April 23, 2001**  
Application Deemed Administratively Complete: **April 23, 2001**  
Significant Modification Application Received: **October 8, 1999**  
AFS Number: **030-021-0005A**

**Permit Issuance and Appeal Processes:** In accordance with Sections 75-2-217 and 218, MCA, and Administrative Rules of Montana (ARM), ARM Title 17, Chapter 8, Subchapter 12, Operating Permit Program, this operating permit is hereby issued by the Department of Environmental Quality (Department) as effective and final on September 11, 2003. This cover sheet must be attached to the enclosed Date of Decision issued on August 11, 2003, and the permit must be kept on-site at the above named facility.

Issued by the Department of Environmental Quality

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Montana Air Quality Operating Permit  
Department of Environmental Quality**

<b>SECTION I - GENERAL INFORMATION .....</b>	<b>1</b>
<b>SECTION II - SUMMARY OF EMISSION UNITS .....</b>	<b>2</b>
<b>SECTION III - PERMIT CONDITIONS.....</b>	<b>4</b>
A.    FACILITY-WIDE .....	4
B.    WOOD WASTE BOILER .....	6
C.    NATURAL GAS BOILERS .....	9
D.    MDF RAW MATERIAL HANDLING FUGITIVES .....	10
E.    M02-M11 LINE 1 MDF MATERIAL HANDLING BAGHOUSES .....	11
F.    M13 - LINE 1 MDF MATERIAL HANDLING BAGHOUSES.....	13
G.    MISCELLANEOUS MDF MATERIAL HANDLING BAGHOUSE AND CYCLONES.....	15
H.    LINE 1 - MDF FIBER DRYERS .....	17
I.    MDF FORMING & FINISHING .....	19
J.    LINE 2 MDF FIBER DRYERS .....	20
K.    LINE 2 MDF PRESS.....	22
L.    M20 AND M21 - MDF SANDER BAGHOUSES; M22 - MDF REJECT BAGHOUSE; M23 - MDF FORMING BAGHOUSE; M24 - MDF COEN FUEL BIN BAGHOUSE .....	23
M.    MDF HOT OIL NATURAL GAS BURNER .....	25
N.    OUTDOOR PLYWOOD PLANT PROCESS AND MATERIAL HANDLING FUGITIVE EMISSIONS.....	26
O.    PLYWOOD PRESSES.....	27
P.    PLYWOOD MATERIAL HANDLING BAGHOUSES AND CYCLONES .....	28
Q.    PLYWOOD VENEER DRYERS.....	29
R.    OUTSIDE SAWMILL PROCESS AND MATERIAL HANDLING FUGITIVE EMISSIONS.....	31
S.    LUMBER DRYING .....	32
T.    SAWMILL MATERIAL HANDLING CYCLONES .....	33
U.    FUGITIVE EMISSIONS: VEHICLE TRAFFIC .....	35
V.    HOG BOILER FUEL HANDLING & STORAGE.....	36
W.    MISCELLANEOUS EMISSIONS SOURCES .....	38
<b>SECTION IV - NON-APPLICABLE REQUIREMENTS .....</b>	<b>39</b>
A.    FACILITY-WIDE .....	39
B.    EMISSIONS UNIT NONAPPLICABLE REQUIREMENTS .....	39
<b>SECTION V - GENERAL PERMIT CONDITIONS.....</b>	<b>40</b>
A.    COMPLIANCE REQUIREMENTS.....	40
B.    CERTIFICATION REQUIREMENTS .....	40
C.    PERMIT SHIELD .....	41
D.    MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS .....	42
E.    PROMPT DEVIATION REPORTING .....	43
F.    EMERGENCY PROVISIONS .....	43
G.    INSPECTION AND ENTRY .....	44
H.    FEE PAYMENT .....	44
I.    MINOR PERMIT MODIFICATIONS.....	45
J.    CHANGES NOT REQUIRING PERMIT REVISION .....	45
K.    SIGNIFICANT PERMIT MODIFICATIONS .....	46
L.    REOPENINGS FOR CAUSE .....	46
M.    PERMIT EXPIRATION AND RENEWAL.....	47
N.    SEVERABILITY CLAUSE .....	47
O.    TRANSFER OR ASSIGNMENT OF OWNERSHIP .....	48
P.    EMISSIONS TRADING, MARKETABLE PERMITS, ECONOMIC INCENTIVES .....	48
Q.    NO PROPERTY RIGHTS CONVEYED .....	48
R.    TESTING REQUIREMENTS.....	48

<b>S.</b>	<b>SOURCE TESTING PROTOCOL .....</b>	<b>48</b>
<b>T.</b>	<b>MALFUNCTIONS .....</b>	<b>48</b>
<b>U.</b>	<b>CIRCUMVENTION.....</b>	<b>48</b>
<b>V.</b>	<b>MOTOR VEHICLES.....</b>	<b>48</b>
<b>W.</b>	<b>ANNUAL EMISSIONS INVENTORY .....</b>	<b>48</b>
<b>X.</b>	<b>OPEN BURNING .....</b>	<b>49</b>
<b>Y.</b>	<b>PRECONSTRUCTION PERMITS.....</b>	<b>49</b>
<b>Z.</b>	<b>NATIONAL EMISSION STANDARD FOR ASBESTOS.....</b>	<b>50</b>
<b>AA.</b>	<b>ASBESTOS.....</b>	<b>50</b>
<b>BB.</b>	<b>STRATOSPHERIC OZONE PROTECTION - SERVICING OF MOTOR VEHICLE AIR CONDITIONERS .....</b>	<b>50</b>
<b>CC.</b>	<b>STRATOSPHERIC OZONE PROTECTION - RECYCLING AND EMISSIONS REDUCTIONS .....</b>	<b>50</b>
<b>DD.</b>	<b>EMERGENCY EPISODE PLAN.....</b>	<b>51</b>
<b>EE.</b>	<b>DEFINITIONS.....</b>	<b>51</b>
<b>APPENDIX. A INSIGNIFICANT EMISSION UNITS.....</b>		<b>A-1</b>
<b>APPENDIX. B DEFINITIONS AND ABBREVIATIONS.....</b>		<b>B-1</b>
<b>APPENDIX. C NOTIFICATION ADDRESSES .....</b>		<b>C-1</b>
<b>APPENDIX. D AIR QUALITY INSPECTOR INFORMATION .....</b>		<b>D-1</b>



Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

## **SECTION I - GENERAL INFORMATION**

The following general information is provided pursuant to ARM 17.8.1210(1).

**Company Name:** Plum Creek Manufacturing, L.P.

**Mailing Address:** P.O. Box 1990

**City:** Columbia Falls      **State:** Montana      **Zip:** 59912-1990

**Plant Name:** Columbia Falls Operation

**Plant Location:** Section 7 and the SW¼ of Section 8, Township 30 North, Range 20 West, in Flathead County, Columbia Falls, Montana

**Plant Mailing Address:** 500 12th Avenue West

**Responsible Official:** Michael J. Covey      **Phone:** 406-892-6105

**Facility Contact Person:** Mitchell Leu      **Phone:** 406-892-6217

**Primary SIC Code:** 2421, 2436, 2493

**Nature of Business:** Lumber, Plywood, Fiberboard

**Description of Process:** This facility produces lumber, plywood, and a medium density fiberboard (MDF). In addition to the sawmill, plywood plant, and MDF plant, the site includes a large wood waste boiler, three smaller natural gas boilers, two wood waste burners used to supply heat for the MDF fiber dryers, and one wood waste burner to heat the veneer dryer.

The sawmill and plywood plant receive raw logs by truck. The logs are stored and sorted before being transferred to the sawmill for sawing into dimension lumber or to the plywood plant for peeling into veneer. Waste wood such as chips, sawdust, and planer shavings are transferred to the MDF plant for processing into fiberboard. Wood shavings and sawdust are also received from outside facilities as raw material for the fiberboard plant. Fugitive emissions from wood-waste transfer are controlled with baghouses or cyclones. Fugitive emissions from haul roads and the log deck are controlled with chemical dust suppressants.

All three plants share the Riley-Union Stoker boiler as a source of process steam for operations. The boiler uses wood as a fuel and burns a mixture of bark, sawdust, sanderdust, and reject material from the plywood and fiberboard operations. The veneer dryer is heated with wood through the use of a Wellons wood waste cell. The exhaust gases from the Wellons unit make direct contact with the veneer and then exit to atmosphere through an E-tube wet electrostatic precipitator. The MDF face & core fiber dryers are also heated primarily with wood. Two Coen and two Energex sander dust burners heat the flash-tube dryers to dry the wood fiber for fiberboard manufacture. The MDF face & core fiber dryer pollution control equipment includes long cone high-efficiency cyclones followed by four wet Electrostatic Precipitators (ESPs). The line 2 MDF pollution control equipment includes two venturi scrubbers followed by three biofilters.

## SECTION II - SUMMARY OF EMISSION UNITS

The emission units regulated by this permit include the following (ARM 17.8.1211):

Summary of Emissions Units Regulated by this Permit		
Emissions Unit ID	Description	Pollution Control Device/Practice
B01	Riley-Union Stoker Boiler	ESP following multiclone
B02	Boiler 20,000 pph Steam - Natural Gas	None
B04	Combustion Engineering Boiler	None
M01	Line 1 MDF Raw Material Handling Fugitives	Unloading activities are controlled by enclosure in MDF Raw Materials Building. Shavings are stored inside building and sawdust stored outside (no control). Fugitive dust from the stacker discharge is controlled by a cloth chute.
M02	Line 1 MDF N. Sander Baghouse #7	Baghouse is a control device
M03	Line 1 MDF S. Sander Baghouse #8	Baghouse is a control device
M04	Line 1 MDF Board Trim Fuel Baghouse #10	Baghouse is a control device
M05	Line 1 MDF Sanderdust Fuel Baghouse	Baghouse is a control device
M06	Line 1 MDF Hog Fuel Boiler Sanderdust Baghouse #11	Baghouse is a control device
M07	Line 1 MDF In-Line Baghouse #5	Baghouse is a control device
M08	Line 1 MDF CPS & In-line Baghouse #6	Baghouse is a control device
M09	Line 1 MDF Metering Bin Baghouse #1	Baghouse is a control device
M10	Line 1 MDF Felter Baghouse #1	Baghouse is a control device
M11	Line 1 MDF Felter Baghouse #2	Baghouse is a control device
M12	Line 1 MDF Reject Fiber Cyclone & Baghouse	Baghouse is a control device
M13	Line 1 MDF Materials Handling Baghouses (2)	Baghouses are control devices
M14	Line 1 MDF Fire Dump Cyclone (emergency only)	Cyclone is a control device
M15	Line 1 MDF Face & Core Dryers	Primary control - four high efficiency material handling cyclones Secondary control - four wet ESP units which vent to a common stack
M16	Line 1 MDF Forming & Finishing	None
M17	Line 1 MDF Board Trim Cyclone	Cyclone is a control device
M18	Line 2 MDF Fiber Dryers	Two venturi scrubbers in line with a biofilter system.
M19	Line 2 MDF Press	Emissions from the press vents shall be routed to the venturi scrubbers and biofilter system
M20	Line 2 MDF North Sander Baghouse	Baghouse is control device
M21	Line 2 MDF South Sander Baghouse	Baghouse is control device
M22	Line 2 MDF Reject Baghouse	Baghouse is control device
M23	Line 2 MDF Forming Baghouse	Baghouse is control device
M24	Line 2 MDF Coen Fuel Bin Baghouse	Baghouse is control device
M25	Line 2 MDF Hot Oil Natural Gas Burner	None
P02	Bucking Saws	None
P04	#1 Chip Truck Bin Loadout	None
P05	#2 Chip Truck Bin Loadout	None
P06	#1 Truck Bin Loadout, Sawdust	None
P07	#2 Truck Bin Loadout, Sawdust	None
P08	#3 Truck Bin Loadout, Hog Fuel	None

P14	Veneer Dryers, roof vents at feed point	None
P16	Plywood Presses	None
P19	Plywood Sander Baghouse	Baghouse is a control device
P20	Plywood 18" Trim Baghouse	Baghouse is a control device
P21	Plywood 30" Trim Baghouse	Baghouse is a control device
P22	Veneer Dryers	A wet ESP controls the particulate emissions from the Wellons wood waste burner and the veneer dryer. There are no controls for the VOC emissions.
P23	Plywood Chip Bin Cyclone	Cyclone is a control device
S02	Chop Saws	None
S05	Sawdust Truck Bin Loadout	None
S08	Planer Shavings Truck Bin Loadout	None
S10	Lumber Drying Kilns	None
S12	Planer #3 Cyclone	Cyclone is a control device
S14	Planer #4 Cyclone	Cyclone is a control device
S15	Planer Shavings Truck Bin Cyclone	Cyclone is a control device
S16	Sawmill Chip Bin Cyclone	Cyclone is a control device
S17	Sawmill Sawdust Target Box	Target Box is a control device
F01	Vehicle Activity	Water and Chemical stabilizers are applied as necessary.
F04	Hog Boiler Fuel Handling & Storage	None
H04	Wood Grain Ink	None
H05	PMA Glycol Ether Solvent	None

### SECTION III - PERMIT CONDITIONS

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility (ARM 17.8.1211, 1212, and 1213).

#### A. Facility-Wide

FACILITY WIDE PERMIT CONDITIONS				
Condition	Rule Condition	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.2	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.3	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.4	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precaution	-----
A.5	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution - Construction	20%
A.6	ARM 17.8.309	Particulate Matter, Fuel Burning Equipment	Particulate Matter	$E = 0.882 * H - 0.1664$ or $E = 1.026 * H - 0.233$
A.7	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E = 4.10 * P0.67$ or $E = 55 * P0.11 - 40$
A.8	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	11b/MMBtu fired
A.9	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.10	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-----
A.11	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-----
A.12	40 CFR 68	Chemical Accident Prevention	Risk Management Plan	-----
A.13	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-----
A.14	ARM 17.8.1207	Reporting Requirements	Annual Certification	Annual Certification

#### Conditions

- A.1. Pursuant to ARM 17.8.304(1), Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.
- A.2. Pursuant to ARM 17.8.304(2), Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.
- A.3. Pursuant to ARM 17.8.308(1), Plum Creek shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.



- A.4. Pursuant to ARM 17.8.308(2), Plum Creek shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter unless otherwise specified by rule or in this permit.
- A.5. Pursuant to ARM 17.8.308, Plum Creek shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater average over six consecutive minutes unless otherwise specified by rule or in this permit.
- A.6. Pursuant to ARM 17.8.309 unless otherwise specified by rule or in this permit, Plum Creek shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations:

For existing fuel burning equipment (installed before November 23, 1968):  $E = 0.882 * H - 0.1664$   
For new fuel burning equipment (installed on or after November 23, 1968):  $E = 1.026 * H - 0.233$

Where H is the heat input capacity in Million Btu (MMBtu) per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu.

- A.7. Pursuant to ARM 17.8.310 unless otherwise specified by rule or in this permit, Plum Creek shall not cause or authorize particulate matter to be discharged, from any operation, process or activity, into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter calculated using the following equations:

For process weight rates up to 30 tons per hour:  $E = 4.10 * P^{0.67}$   
For process weight rates in excess of 30 tons per hour:  $E = 55.0 * P^{0.11} - 40$

Where E = rate of emissions in pounds per hour and P = process weight rate in tons per hour.

- A.8. Pursuant to ARM 17.8.322(4), Plum Creek shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million Btu fired unless otherwise specified by rule or in this permit.
- A.9. Pursuant to ARM 17.8.322(5), Plum Creek shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions unless otherwise specified by rule or in this permit.
- A.10. Pursuant to ARM 17.8.324(3), Plum Creek shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1) unless otherwise specified by rule or in this permit.
- A.11. Pursuant to ARM 17.8.324 unless otherwise specified by rule or in this permit, Plum Creek shall not use any compartment of any single or multiple compartment oil-effluent water separator which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.

## Reporting

- A.12. A Risk Management Plan developed in accordance with 40 CFR 68 shall be registered with the United States Environmental Protection Agency by June 21, 1999. Plum Creek shall submit a certification statement to the Department that states Plum Creek is in compliance with the requirements of 40 CFR 68, including registration (40 CFR 68.160) by June 21, 1999.
- A.13. On or before January 31 and July 31 of each year, Plum Creek shall submit to the Department the compliance monitoring reports required by Section V.D. These reports must contain all information required by Section V.D, as well as the information required by each individual emissions unit. For the reports due by January 31 of each year, Plum Creek may submit a single report, provided that it contains all the information required by Section V.B & V.D. Per ARM 17.8.1207,

*any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”*

- A.14. By January 31 of each year, Plum Creek shall submit to the Department the compliance certification report required by Section V.B of this permit. The annual certification report required by Section V.B must include a statement of compliance based on the information available, which identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

*any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”*

## B. Wood Waste Boiler

### B01 - Riley-Union Stoker Boiler

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
B.1, B.2, B.10, B.11, B.16, B.17, B.21	Opacity	20%	Operate, Inspect, and maintain -- Multiclone	When boiler operates	Semiannually
			Method 9	Semiannually	Semiannually
B.3, B.12, B.20, B.21	Particulate Matter	8.77 lb/hr	Method 5	Every 3 Years	Semiannually
B.4, B.12, B.20, B.21	PM <sub>10</sub>	6.94 lb/hr	Method 201A	Every 3 Years	Semiannually
B.5, B.13, B.20, B.21	NOx	134.50 lb/hr	Method 7E	Every 3 Years	Semiannually

B.6, B.13, B.20, B.21	CO	468 lb/hr	Method 10	Every 3 Years	Semiannually
B.7, B.14, B.18, B.21	ESP	Operate and Maintain	Operate, Inspect, and Maintain	Whenever boiler operates	Semiannually
B.8, B.15, B.19, B.21	Sulfur in Fuel (liquid or solid fuels)	<1lb S/MMBtu fired	Recordkeeping	As necessary	Semiannually
B.9, B.15, B.19, B.21	Sulfur in Fuel (gaseous)	50 gr/100 CF	Recordkeeping	As necessary	Semiannually

### Conditions

- B.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- B.2. During the building of new fires, cleaning of grates or soot blowing, ARM 17.8.304(2) applies except that a maximum average opacity of 60% is permissible for not more than one 4-minute period in any 60 consecutive minutes (ARM 17.8.304(3)).
- B.3. Total Particulate matter emissions from the Riley-Union Stoker boiler shall be limited to 8.77 lb/hr (ARM 17.8.715).
- B.4. PM<sub>10</sub> emissions from the Riley-Union Stoker boiler shall be limited to 6.94 lb/hr (ARM 17.8.710 and ARM 17.8.715).
- B.5. NO<sub>x</sub> (reported as NO<sub>2</sub>) emissions from the Riley-Union Stoker boiler shall be limited to 134.50 lb/hr (ARM 17.8.715).
- B.6. CO emissions from the Riley-Union Stoker boiler shall be limited to 468 lb/hr (ARM 17.8.715).
- B.7. Plum Creek shall operate and maintain the ESP on the Riley-Union Stoker boiler (ARM 17.8.715).
- B.8. Plum Creek shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million Btu fired (ARM 17.8.322(4)).
- B.9. Plum Creek shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions (ARM 17.8.322(5)).

### Compliance Demonstration

- B.10. Every 6 months a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test shall be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- B.11. Plum Creek shall operate the multicclone whenever the Riley-Union Stoker boiler is fired.

- B.12. Every 3 years a Method 5 and Method 201A source test shall be performed on the Riley-Union Stoker boiler ESP to monitor compliance with the emission limitations in Sections III.B.3 and 4. The source test methods shall conform to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.
- B.13. Every 3 years a Method 7E and a Method 10 source test shall be performed on the Riley-Union Stoker boiler to test for NO<sub>x</sub> and CO concurrently. The tests shall be used to monitor compliance with the emission limitations in Section III.B.5 and 6. The test methods shall conform to 40 CFR Part 60, Appendix A and the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- B.14. Plum Creek shall perform at least semiannual inspections of the ESP on the Riley-Union Stoker boiler. The inspections should be conducted in accordance with the manufacturer's recommendations.
- B.15. Plum Creek shall burn only wood waste and natural gas in the Riley-Union Stoker boiler.

### **Recordkeeping**

- B.16. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- B.17. Plum Creek shall record in a log any circumvention of the multiclone while operating the Riley-Union Stoker boiler. In addition, all major maintenance activities involving the boiler or multiclone shall be recorded in the log. Each log entry must include the date, time, observer's initials, and the maintenance activity or preventive action taken. The log must be maintained on-site and must be submitted to the Department upon request.
- B.18. Plum Creek shall record the results of the semiannual ESP inspections; each log entry must include the date, time, observer's initials, results of the inspection, and any maintenance activity or preventive action conducted for the ESP or Riley-Union Stoker boiler. The log must be maintained on-site and must be submitted to the Department upon request.
- B.19. Plum Creek shall record in a log anytime a material other than wood waste or natural gas is burned in the Riley-Union Stoker boiler. The log must include the date, time, material, and quantity of material fed into the boiler. The log must be maintained on-site and must be submitted to the Department upon request.

### **Reporting**

- B.20. The source test report(s) shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- B.21. The annual compliance certification report required by Section V.B must contain a certification statement for the above applicable requirements. The semiannual compliance monitoring reports shall provide:
  - a. Results of the Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.B.16;
  - b. Results of the required source tests must be included in the reporting period in which it is performed; the actual test report must be submitted as specified by Section III.B.20;

- c. Verification of whether the multiclone was operated and maintained as required by Section III.B.11 and 17;
- d. Verification of whether the ESP was operated and maintained as required by Section III.B.14 and 18; and
- e. Verification of whether any material other than wood-waste and natural gas were combusted in the Riley-Union Stoker boiler and provide a summary of material combusted during the reporting period.

## C. Natural Gas Boilers

### B02 - 20,000 pph Steam Boiler and B04 - Combustion Engineering Boiler

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
C.1, C.4, C.5, C.6	Opacity	20%	Burning Only Natural Gas	Ongoing	Semiannually
C.1, C.4, C.5, C.6	Opacity	20%	Burning Only Natural Gas	Ongoing	Semiannually
C.2, C.4, C.5, C.6	Particulate Matter	See Table C.2.			
C.2, C.4, C.5, C.6	PM <sub>10</sub>	See Table C.2			
C.3, C.4, C.5, C.6	Sulfur in Fuel	50 gr/100 CF			

### Conditions

- C.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- C.2. Plum Creek shall comply with the emission limitations contained in Table C.2 (ARM 17.8.710 and ARM 17.8.715).

Table C.2			
Emissions Unit	Total Particulate Emissions Limit	PM-10 Emissions Limit	Rule Citation
B02 20,000 pph Steam Boiler	0.10 lb/hr	0.10 lb/hr	ARM 17.8.710
B04 Combustion Engineering Boiler	6.20 lb/mmcf	6.20 lb/mmcf	ARM 17.8.715

- C.3. Plum Creek shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions (ARM 17.8.322(5)).

### Compliance Demonstration

- C.4. The compliance monitoring method required by this permit for opacity Section III.C.1, the particulate limit and PM<sub>10</sub> limit Section III.C.2, and sulfur compound in fuel requirements Section III.C.3 may be satisfied by only burning pipeline quality natural gas, i.e., gas containing sulfur compounds less than 50 grains per 100 cubic feet of gaseous fuel, in the boilers. However, this does not preclude the Department from initiating an enforcement action if a Reference Method test indicates that one of these limits is being violated, even if only natural gas is being combusted.

## Recordkeeping

C.5. Plum Creek shall enter in a daily log the operating status of each boiler and type of fuel fired.

## Reporting

C.6. The annual compliance certification reports must contain a certification stating whether the facility is in compliance with the above applicable requirements. The semiannual compliance monitoring reports must address the type of fuel burned in the boilers as specified by Section III.C.5.

## D. MDF Raw Material Handling Fugitives

### M01 - MDF Raw Material Handling Fugitives

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
D.1, D.3, D.4, D.6, D.7, D.8	Opacity	20%	Visual Surveys	Once per Calendar Week	Semiannually
			Method 9	As Required by the Department	
D.2, D.5, D.7, D.8	Particulate Matter, Industrial Processes	$E = 55 * P^{0.11} - 40$	Method 5	As Required by the Department	Semiannually

## Conditions

- D.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- D.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 55.0 * P^{0.11} - 40$ , where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour (ARM 17.8.310).

## Compliance Demonstration

- D.3. Once per calendar week during daylight hours, Plum Creek shall visually survey the outside material loadout points, the outside material handling conveyors and screens, and the outside material storage piles for any sources of excessive fugitive emissions. For the purpose of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. If sources of excessive fugitive emissions are identified, Plum Creek shall contain or minimize the source of emissions (e.g., sweep up the material, cover the material, or use water or chemical treatment to minimize the fugitive emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Plum Creek shall take precautions to avoid creating a water quality problem from surface water runoff. The person conducting the survey shall record the results of the survey in the log. Conducting a visual survey does not relieve Plum Creek of a liability for a violation determined using Reference Method 9.

- D.4. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- D.5. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.D.2. The test methods shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

### Recordkeeping

- D.6. Each log entry shall include: date; time; observer; observation point; observation location; ambient conditions including, but not limited to approximate wind speed; wind direction; cloud cover; and results of the visual surveys. If any corrective action is required, the time, date, and any preventive or corrective action taken should be recorded in the log.

### Reporting

- D.7. The Method 5 and Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- D.8. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- Verification that the visual surveys were performed and logged as specified by Section III.D.3;
  - Verification that a log of corrective actions was maintained as specified by Section III.D.6;
  - Identification of any instances of excessive fugitive emissions and the corrective action taken; and
  - Results of any source test performed during the reporting period. The actual test report shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.

### E. M02-M11 Line 1 MDF Material Handling Baghouses

**M02 - MDF N. Sander Baghouse #7; M03 - MDF S. Sander Baghouse #8; M04 - MDF Board Trim Fuel Baghouse #10; M05 - MDF Sanderdust Fuel Baghouse; M06 - MDF Hog Fuel Boiler Sanderdust Baghouse #11; M07 - MDF In-Line Baghouse #5; M08 - MDF CPS & In-Line Baghouse #6; M09 - MDF Metering Bin Baghouse #1; M10 - MDF Felter Baghouse #1; M11 - MDF Felter Baghouse #2**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
E.1, E.4, E.10, E.12	Opacity	20%	Method 9	Semiannually	Semiannually
E.2, E.5, E.6, E.8, E.11, E.12	Particulate Matter/PM <sub>10</sub>	See Table E.2.	Operation and maintenance of baghouses	Whenever process equipment is operating	Semiannually
			Method 5(PM)	As Required by the Department	Semiannually
			Method 201A (PM <sub>10</sub> )	As Required by the Department	Semiannually
E.3, E.7, E.9, E.12	Hours of Operation	8500 hr/yr	Recordkeeping	Semiannually	Semiannually

## Conditions

- E.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any emissions point in the total MDF process, excluding drying, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2))
- E.2. Plum Creek shall comply with the emission limitations contained in Table E.2 (ARM 17.8.710 and ARM 17.8.715).

Table E.2			
Emissions Unit	Total Particulate Emissions Limit	PM <sub>10</sub> Emissions Limit	Rule Citation
M02 MDF N. Sander Baghouse #7	2.12 lb/hr	2.12 lb/hr	ARM 17.8.710 & ARM 17.8.715
M03 MDF S. Sander Baghouse #8	2.12 lb/hr	2.12 lb/hr	ARM 17.8.710 & ARM 17.8.715
M04 MDF Board Trim Fuel Baghouse #10	0.52 lb/hr	0.52 lb/hr	ARM 17.8.710 & ARM 17.8.715
M05 MDF Sanderdust Fuel Baghouse	0.16 lb/hr	0.16 lb/hr	ARM 17.8.710 & ARM 17.8.715
M06 MDF Hog Fuel Boiler Sanderdust Baghouse #11	0.58 lb/hr	0.58 lb/hr	ARM 17.8.710 & ARM 17.8.715
M07 MDF In-Line Baghouse #5	1.93 lb/hr	1.93 lb/hr	ARM 17.8.710 & ARM 17.8.715
M08 MDF CPS & In-line Baghouse #6	1.93 lb/hr	1.93 lb/hr	ARM 17.8.710 & ARM 17.8.715
M09 MDF Metering Bin Baghouse #1	1.93 lb/hr	1.93 lb/hr	ARM 17.8.710 & ARM 17.8.715
M10 MDF Felter Baghouse #1	1.93 lb/hr	1.93 lb/hr	ARM 17.8.710 & ARM 17.8.715
M11 MDF Felter Baghouse #2	1.93 lb/hr	1.93 lb/hr	ARM 17.8.710 & ARM 17.8.715

- E.3. Hours of operation of the Line 1 MDF plant shall be limited to 8500 hours per year (ARM 17.8.710).

## Compliance Demonstration

- E.4. Every 6 months a Method 9 test must be performed on each MDF Material Handling Baghouse in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test shall be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- E.5. The MDF Material Handling baghouses must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- E.6. As required by the Department, Plum Creek shall perform a Method 5 and a Method 201A test or other approved test to monitor compliance with the particulate emissions limit in Section III Table E.2. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.



- E.7. Plum Creek shall monitor compliance by recording the hours operated per month for each baghouse in a log book.

### **Recordkeeping**

- E.8. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.
- E.9. Plum Creek shall record in a log the number of hours each MDF Material Handling Baghouse operated per month. The log must be maintained on-site and must be submitted to the Department upon request.

### **Reporting**

- E.10. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- E.11. The Method 5 and Method 201 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- E.12. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- The results of the semiannual Method 9 tests;
  - Verification that semiannual inspections were performed and logged, and provide a summary of the results of the inspections for any maintenance activity or preventive action taken for any MDF Material Handling baghouse and cyclone;
  - The monthly number of hours operated for each MDF Material Handling baghouse as required by Section III.E.9; and
  - The results of any required Method 5 or 201 source test during the reporting period in which it is performed; the actual test reports must be submitted as specified by Section III.E.11.

### **F. M13 - Line 1 MDF Material Handling Baghouses**

Permit Condition(s)	Pollutant Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
F.1, F.5, F.6, F.11, F.13	Opacity	20%	Method 9	Semiannually	Semiannually
F.2, F.7, F.12, F.13	Particulate Matter	See Table F.2.	Method 5	Every 3 Years	Semiannually
F.2, F.7, F.12, F.13	PM <sub>10</sub>	See Table F.2	Method 201A	Every 3 Years	Semiannually
F.3, F.8, F.10, F.13	Hours of Operation	8500 hrs/yr	Recordkeeping	Semiannually	Semiannually
F.4, F.5, F.6, F.9, F.13,	Baghouse Control Requirement	Operate and Maintain	Installation, Operation, Inspection, & Maintenance	Semiannually & As Necessary	Semiannually & As Necessary

## Conditions

- F.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any emissions point in the total MDF process, excluding drying, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- F.2. Plum Creek shall comply with the emission limitations contained in Table F.2 (ARM 17.8.710 and ARM 17.8.715).

Table F.2			
Emissions Unit	Total Particulate Emissions Limit	PM10 Emissions Limit	Rule Citation
M13- MDF Materials Handling Baghouses (2) (includes both)	1.93 lb/hr	1.93 lb/hr	ARM 17.8.715

- F.3. Hours of operation of the Line 1 MDF plant shall be limited to 8500 hours per year (ARM 17.8.710).
- F.4. Plum Creek shall operate and shall maintain M13 - MDF Material Handling baghouses (ARM 17.8.715).

## Compliance Demonstration

- F.5. Every 6 months a Method 9 test must be performed on M13 MDF Material Handling Baghouse in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- F.6. The M13 - MDF Material Handling Baghouses must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- F.7. The testing for M13 - MDF Materials Handling baghouses shall be conducted on an every-3-year basis to monitor compliance with the emission limitations contained in Section III Table F.2. The source test methods shall conform to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.
- F.8. Plum Creek shall monitor compliance by recording the hours operated per month for the baghouse in a log book.

## Recordkeeping

- F.9. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

- F.10. Plum Creek shall record in a log the number of hours M13 - MDF Material Handling baghouse operated per month. The log must be maintained on-site and must be submitted to the Department upon request.

### Reporting

- F.11 Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- F.12. The Method 5 and Method 201A source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- F.13. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- The results of the semiannual Method 9 tests;
  - Verification whether the M13 MDF Material Handling baghouse was inspected and maintained as required by Section III.F.6, and provide a summary of the results of the inspections and any maintenance activity or preventive action taken for any MDF Material Handling baghouse;
  - The number of hours operated for M13 MDF Material Handling baghouse as specified by Section III.F.10; and
  - The results of any required Method 5 and Method 201A source tests during the reporting period in which it is performed; the actual test reports must be submitted as specified by Section III.F.12.

### G. Miscellaneous MDF Material Handling Baghouse and Cyclones

#### M12 - MDF Reject Fiber Cyclone & Baghouse; M14 - MDF Fire Dump Cyclone (emergency only); and M17 - MDF Board Trim Cyclone

Permit Conditions	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
G.1, G.4, G.10, G.11	Opacity	20%	Method 9	As Required by the Department	Semiannually
G.2, G.5, G.6, G.8, G.10, G.11	Particulate Matter	$E=55 \cdot P^{0.11} - 40$	Operation and maintenance	Whenever process equipment is operating	Semiannually
			Method 5	As Required by the Department	Semiannually
G.3, G.7, G.9, G.11	Hours of Operation	8500 hrs/yr	Recordkeeping	Semiannually	Semiannually

### Conditions

- G.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any emissions point in the total MDF process, excluding drying, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

- G.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 55.0 * P^{0.11} - 40$ , where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour (ARM 17.8.310).
- G.3. Hours of operation of the Line 1 MDF plant shall be limited to 8500 hours per year (ARM 17.8.710).

### **Compliance Demonstration**

- G.4. As required by the Department, Plum Creek shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- G.5. The MDF Material Handling baghouse and cyclones must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- G.6. Plum Creek shall perform a Method 5 test or other approved test as required by the Department to monitor compliance with the particulate emissions limit in Section III.G.2. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- G.7. Plum Creek shall monitor compliance by recording the hours operated for each MDF Material Handling baghouse and cyclone per month in a log book.

### **Recordkeeping**

- G.8. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.
- G.9. Plum Creek shall record in a log the number of hours each MDF Material Handling baghouse and cyclone operated per month. The log must be maintained on-site and must be submitted to the Department upon request.

### **Reporting**

- G.10. The source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- G.11. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- a. The results of any required Method 9 test; the actual test report must be submitted to the Department upon request as specified by Section III.G.10;
  - b. Verification whether the MDF Material Handling baghouse and cyclones were inspected and maintained as required Section III.G.8, and provide a summary of the results of the inspections and any maintenance activity or preventive action taken for any MDF Material Handling baghouse or cyclone; and

- c. The number of hours operated for each MDF Material Handling baghouse or cyclone as specified by Section III.G.9.

## H. Line 1 - MDF Fiber Dryers

### M15 - MDF Face & Core Fiber Dryers

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
H.1, H.7, H.12, H.16	Opacity	20%	Method 9	Semiannually	Semiannually
H.2, H.8, H.15, H.16	Particulate Matter	23.14 lb/hr	Method 5	Every 3 Years	Semiannually
H.3, H.8, H.15, H.16	PM <sub>10</sub>	23.14 lb/hr	Method 201A	Every 3 Years	Semiannually
H.4, H.9, H.15, H.16	VOC	131.10 lb/hr	Method 25A	Every 3 Years	Semiannually
H.5, H.10, H.13, H.16	Hours of Operation	8500 hr/yr	Recordkeeping	Semiannually	Semiannually
H.6, H.11, H.14, H.16	ESPs	Operate and Maintain	Operate, Inspect, & Maintain	Whenever process equipment is operating	Semiannually

### Conditions

- H.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the MDF face & core fiber dryers that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- H.2. MDF face & core fiber dryer emissions of total particulate shall be limited to 23.14 lb/hr (ARM 17.8.715).
- H.3. MDF face & core fiber dryer emissions of PM<sub>10</sub> shall be limited to 23.14 lb/hr (ARM 17.8.715).
- H.4. MDF face & core fiber dryer emissions of VOC shall be limited to 131.10 lb/hr (ARM 17.8.715).
- H.5. Hours of operation of the MDF plant shall be limited to 8500 hours per year (ARM 17.8.710).
- H.6. Plum Creek shall operate and maintain the 4 ESPs on the MDF face & core fiber dryers (ARM 17.8.710).

### Compliance Demonstration

- H.7. Every 6 months a Method 9 test must be performed on the MDF face & core fiber dryers in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- H.8. Every 3 years source tests shall be performed on the MDF face & core fiber dryers to monitor compliance with the emission limitations contained in Sections III.H.2 and 3. The test methods must be performed in accordance with the Montana Source Test Protocol and Procedures Manual

(ARM 17.8.105 and ARM 17.8.106) and conform to 40 CFR Part 51, Appendix M including back-half, for PM<sub>10</sub> and 40 CFR Part 60, Appendix A, including back-half, for total particulate. The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.

- H.9. Every 3 years a source test shall be performed on the MDF face & core fiber dryers to monitor compliance with the emission limitations contained in Sections III.H.4. The test methods must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106) and conform to 40 CFR Part 60, Appendix A.
- H.10. Plum Creek shall record in a log the number of hours operated per month for both the MDF face & core fiber dryers.
- H.11. Plum Creek shall perform at least semiannual inspections on the 4 ESPs and the MDF face & core fiber dryers. The inspections should be conducted in accordance with the manufacturer's recommendations.

### **Recordkeeping**

- H.12. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- H.13. Plum Creek shall record in a log the number of hours operated per month for both the MDF face & core fiber dryers. The log must be maintained on-site and must be submitted to the Department upon request.
- H.14. Plum Creek shall maintain a log to record the semiannual maintenance inspections of the 4 ESPs. Each log entry must include the date, time, ESP identification, observer's initials and results of the inspection. Maintenance activity or any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

### **Reporting**

- H.15. The Method 5, Method 201A, and Method 25A test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- H.16. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
  - a. Results of the Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.H.12;
  - b. Results of the required source tests must be included in the reporting period in which it is performed; the actual test report must be submitted as specified by Section III.H.15;
  - c. The number of hours operated for each dryer as required by Section III.H.13; and
  - d. Verification that the semiannual inspections were performed and provide a summary of the results of the inspections and any maintenance activity or preventive action taken.

## I. MDF Forming & Finishing

### M16 – MDF Forming & Finishing

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
I.1, I.6, I.10, I.13	Opacity	20%	Method 9	Semiannually	Semiannually
I.2, I.7, I.13	Particulate Matter	25.80 lb/hr	Method 5	As Required	Semiannually
I.3, I.7, I.13	PM <sub>10</sub>	9.50 lb/hr	Method 201A	As Required	Semiannually
I.4, I.8, I.12, I.13	VOC	13.40 lb/hr	Production Limit of 57 tons MDF/hr	Ongoing	Semiannually
			Method 25A	As Required	Semiannually
I.5, I.9, I.11, I.13	Hours of Operation	8500 hr/yr	Recordkeeping	Semiannually	Semiannually

### Conditions

- I.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any MDF forming and finishing that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- I.2. Total emissions combined from the 6 press vent fans, and the 10 board cooler fan vents, shall be limited to 25.80 lb/hr of total particulate (ARM 17.8.715).
- I.3. Total emissions combined from the 6 press vent fans and the 10 board cooler fan vents shall be limited to 9.50 lb/hr of PM<sub>10</sub> (ARM 17.8.715).
- I.4. Total emissions combined from the 6 press vent fans and the 10 board cooler fan vents shall be limited to 13.40 lb/hr of VOC (ARM 17.8.715).
- I.5. Hours of operation of the MDF plant shall be limited to 8500 hours per year (ARM 17.8.710).

### Compliance Demonstration

- I.6. Every 6 months a Method 9 test must be performed on at least one press vent fan and one board cooler fan vent in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Plum Creek may determine which vents are to be tested but each one must be tested at least twice during the permit term. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- I.7. As required by the Department, Plum Creek shall perform a Method 5 and a Method 201A test or other approved tests to monitor compliance with the particulate emissions limit in Section III.I.2 and I.3. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- I.8. Compliance with the VOC emissions limit may be satisfied by limiting production of the MDF to 57 ton/hr. However, Plum Creek shall perform a Method 25A test or other approved test as required by the Department to monitor compliance with the VOC emissions limit in Section III.I.4. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

- I.9. Plum Creek shall record in a log the number of hours operated per month for the MDF 6 press vent fans and the 10 board cooler fans.

### Recordkeeping

- I.10. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- I.11. Plum Creek shall record in a log the number of hours operated per month for the MDF 6 press vent fans and the 10 board cooler fan vents. The log must be maintained on-site and must be submitted to the Department upon request.
- I.12. Plum Creek shall record in a log MDF hourly production rates in excess of 57 tons MDF/hr. The log must include the date, time, production rate, and operator's initials. The log must be maintained on-site and must be submitted to the Department upon request.

### Reporting

- I.13. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- Results of the Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.I.10;
  - The number of hours operated for the 6 press vent fans and the 10 board cooler fan vents as required by Section III.I.11; and
  - Verification that MDF production rates were logged and provide a summary of production rates exceeding 57 ton/hr.

## J. Line 2 MDF Fiber Dryers

### M18 - MDF Fiber Dryers

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
J.1, J.7, J.12, J.14	Opacity	20%	Method 9	Semiannually	Semiannually
J.2, J.7, J.12, J.14	Particulate Matter	21.2 lb/hr	Method 5	Every 3 Years	Semiannually
J.3, J.8, J.12, J.14	PM <sub>10</sub>	21.2 lb/hr	Method 201A	Every 3 Years	Semiannually
J.4, J.9, J.12, J.14	VOC	78.1 lb/hr	Method 25A	Every 3 Years	Semiannually
J.5, J.10, J.13, J.15	Venturi Scrubbers and Biofilter System	Operate and Maintain	Operate, Inspect, & Maintain	Whenever process equipment is operating	Semiannually
J.6, J.10, J.13, J.15	Flue gas recirculator and low NO <sub>x</sub> burner	Operate and Maintain	Operate and Maintain	Whenever heat source for Line 2 MDF fiber dryer is operating	Semiannually



## **Conditions**

- J.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the Line 2 MDF fiber dryers that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- J.2. Line 2 MDF fiber dryer emissions of total particulate shall be limited to 21.2 lb/hr. (ARM 17.8.715).
- J.3. Line 2 MDF fiber dryer emissions of PM<sub>10</sub> shall be limited to 21.2 lb/hr. (ARM 17.8.715).
- J.4. Line 2 MDF fiber dryer emissions of VOC shall be limited to 78.1 lb/hr. (ARM 17.8.715).
- J.5. Plum Creek shall operate and maintain two venturi scrubbers with three biofilter stacks as control for the Line 2 MDF fiber dryers (ARM 17.8.710).
- J.6. Plum Creek shall operate and maintain a flue gas recirculation/low NO<sub>x</sub> burner (FGR/LNB) on the heat source for the Line 2 MDF fiber dryer (ARM 17.8.715).

## **Compliance Demonstration**

- J.7. Every 6 months a Method 9 test must be performed on the Line 2 MDF fiber dryer in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- J.8. Every 3 years source tests shall be performed on the Line 2 MDF fiber dryer to monitor compliance with the emission limitations contained in Sections III.J.2 and 3. The test methods must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105 and ARM 17.8.106) and conform to 40 CFR Part 51, Appendix M including back-half, for PM<sub>10</sub> and 40 CFR Part 60, Appendix A, including back-half, for total particulate. The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.
- J.9. Every 3 years a source test shall be performed on the Line 2 MDF fiber dryer to demonstrate compliance with the emission limitations contained in Sections III.J.4. The test methods must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106) and conform to 40 CFR Part 60, Appendix A.
- J.10. Plum Creek shall perform at least semiannual inspections on the 2 venturi scrubbers and the biofilter system. The inspections should be conducted in accordance with the manufacturer's recommendations.
- J.11. Plum Creek shall perform at least semiannual inspection on the FGR/LNB. The inspections should be conducted in accordance with the manufacturer's recommendations.

## Recordkeeping

- J.12. All source test recordkeeping shall be performed in accordance with the test method being used and the Montana Source Test Protocol and Procedures Manual, except the Method 9 test report shall be submitted to the Department upon request.
- J.13. Plum Creek shall maintain a log to record the semiannual maintenance inspections of the 2 venturi scrubbers, the biofilter system, the FGR and LNB for the Line 2 MDF fiber dryers. Each log entry must include the date, time, observer's initials and results of the inspection. Maintenance activity or any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

## Reporting

- J.14. The Method 5, Method 201A, and Method 25A test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- J.15. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide the following:
- Results of the Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.J.12;
  - Results of the required source tests must be included in the reporting period in which it is performed; the actual test report must be submitted as specified by Section III.J.14; and
  - Verification that the semiannual inspections were performed and provide a summary of the results of the inspections and any maintenance activity or preventive action taken.

## K. Line 2 MDF Press

### M19 - Line 2 MDF Press

Permit Conditions	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
K.1, K.2, K.3, K.4	Venturi Scrubbers and Biofilter system	-----	Operate, Inspect, & Maintain	Whenever process equipment is operating	Semiannually

## Conditions

- K.1. Plum Creek shall operate and Maintain 2 venturi scrubbers with 3 biofilter stacks as control for the Line 2 MDF Press (ARM 17.8.710).

## Compliance Demonstration

- K.2. Plum Creek shall perform at least semiannual inspections on the 2 venturi scrubbers, the biofilter system and the Line 2 MDF fiber dryers. The inspections should be conducted in accordance with the manufacturer's recommendations.

## Recordkeeping

- K.3. Plum Creek shall maintain a log to record the semiannual maintenance inspections of the 2 venturi scrubbers and the biofilter system. Each log entry must include the date, time, observer's initials and results of the inspection. Major maintenance activity or any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

## Reporting

- K.4. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports must provide a verification that the semiannual inspections were performed and provide a summary of the results of the inspections and any maintenance activity or preventive action taken.

## L. M20 and M21 - MDF Sander Baghouses; M22 - MDF Reject Baghouse; M23 - MDF Forming Baghouse; M24 - MDF Coen Fuel Bin Baghouse

### M20 and M21 MDF Sander Baghouses and M22, M23, and M24 MDF Material Handling Baghouses

Permit Conditions(s)	Pollutant Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
L.1, L.5, L.9, L.11	Opacity	20%	Method 9	Semiannually	Semiannually
L.2, L.6, L.10, L.11	Particulate Matter	See Table L.2.	Method 5	Every 3 Years	Semiannually
L.2, L.6, L.10, L.11	PM <sub>10</sub>	See Table L.2	Method 201A	Every 3 Years	Semiannually
L.3, L.4, L.5, L.9, L.11	Baghouse Control Requirement	Operation and Maintenance	Installation, Operation, Inspection, & Maintenance	Semiannually & As Necessary	Semiannually & As Necessary

## Conditions

- L.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any emissions point in the total MDF process, excluding drying, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- L.2. Plum Creek shall comply with the emission limitations contained in Table L.2 (ARM 17.8.710 and ARM 17.8.715).

Table L.2			
Emissions Unit	Total Particulate Emissions Limit	PM <sub>10</sub> Emissions Limit	Rule Citation
M20 - MDF North Sander Baghouse	2.14 lb/hr	2.14 lb/hr	ARM 17.8.715
M21 - MDF South Sander Baghouse	2.14 lb/hr	2.14 lb/hr	ARM 17.8.715
M22 - MDF Reject Baghouse	3.43 lb/hr	3.43 lb/hr	ARM 17.8.715
M23 - MDF Forming Baghouse	2.14 lb/hr	2.14 lb/hr	ARM 17.8.715
M24 - MDF Coen Fuel Bin Baghouse	0.43 lb/hr	0.43 lb/hr	ARM 17.8.715

- L.3. Plum Creek shall operate and shall maintain M20, M21, M22, M23, and M24 MDF Material Handling baghouses (ARM 17.8.715).

### **Compliance Demonstration**

- L.4. Every 6 months a Method 9 test must be performed on M20, M21, M22, and M23 - MDF Material Handling Baghouses in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- L.5. The M20, M21, M22, M23, and M24 - MDF Material Handling Baghouses must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- L.6. The testing for M20, M21, M22, and M23 - MDF Materials Handling baghouses shall continue on an every-3-year basis to monitor compliance with the emission limitations contained in Section III Table L.2. The source test methods shall conform to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.

### **Recordkeeping**

- L.7. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Major maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.
- L.8. All source test recordkeeping shall be performed in accordance with the test method being used and the Montana Source Test Protocol and Procedures Manual, except the Method 9 test report shall be submitted to the Department upon request.

### **Reporting**

- L.9. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- L.10. The Method 5 and Method 201A source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- L.11. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- a. The results of the semiannual Method 9 tests;
  - b. Verification whether the M20, M21, M22 and M23 - MDF Material Handling baghouses were inspected and maintained as required by Section III.L.5, and provide a summary of the results of the inspections and any maintenance activity or preventive action taken for any MDF Material Handling baghouse; and

- c. The results of any required Method 5 and Method 201A source tests during the reporting period in which it is performed; the actual test reports must be submitted as specified by Section III.L.10.

## **M. MDF Hot Oil Natural Gas Burner**

### **M25 - Hot Oil Natural Gas Burner**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
M.1, M.4, M.5, M.6	Opacity	20%	Burning Only Natural Gas	Ongoing	Semiannually
M.1, M.4, M.5, M.6	Opacity	20%	Burning Only Natural Gas	Ongoing	Semiannually
M.2, M.4, M.5, M.6	Particulate Matter	See Table M.2.			
M.2, M.4, M.5, M.6	PM <sub>10</sub>	See Table M.2.			

### **Conditions**

- M.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- M.2. Plum Creek shall comply with the emission limitations contained in Table M.2 (ARM 17.8.710 and ARM 17.8.715).

Table M.2			
Emissions Unit	Total Particulate Emissions Limit	PM <sub>10</sub> Emissions Limit	Rule Citation
M25 - Hot Oil Natural Gas Burner	0.11 lb/hr	0.11 lb/hr	ARM 17.8.710

- M.3. Plum Creek shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions (ARM 17.8.322(5)).

### **Compliance Demonstration**

- M.4. The compliance monitoring method required by this permit for opacity Section III.M.1, the particulate limit and PM<sub>10</sub> limit Section III.M.2, and sulfur compound in fuel requirements Section III.M.3 may be satisfied by only burning pipeline quality natural gas, i.e., gas containing sulfur compounds less than 50 grains per 100 cubic feet of gaseous fuel, in the burners. However, this does not preclude the Department from initiating an enforcement action if a Reference Method test indicates that one of these limits is being violated, even if only natural gas is being combusted.

### **Recordkeeping**

- M.5. Plum Creek shall record occasions when something other than natural gas is burned, the type of fuel, and the time-period it was burned.

## Reporting

- M.6. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports must provide the type of fuel burned in the burners as specified by Section III.M.5.

## N. Outdoor Plywood Plant Process and Material Handling Fugitive Emissions

**P02 - Bucking Saws; P04 - #1 Chip Truck Bin Loadout; P05 - #2 Chip Truck Bin Loadout; P06 - #1 Truck Bin Loadout, Sawdust; P07 - #2 Truck Bin Loadout, Sawdust; and P08 - #3 Truck Bin Loadout, Hog Fuel**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
N.1, N.3, N.4, N.6, N.7 N.8	Opacity	20%	Visual Surveys	Monthly	Semiannually
			Method 9	As Required by the Department	Semiannually
N.2, N.5, N.8	Particulate Matter, Industrial Processes	$E = 55.0 * P^{0.11} - 40$	Method 5	As Required by the Department	Annual Certification

## Conditions

- N.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- N.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 55.0 * P^{0.11} - 40$ , where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour (ARM 17.8.310).

## Compliance Demonstration

- N.3. At least monthly, Plum Creek shall visually survey the above sources for excessive fugitive emissions. For the purpose of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the survey does not have to be EPA Reference Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including the proper location to observe visible emissions. The person conducting the survey shall record the results of the survey in the log. If sources of excessive fugitive emissions are identified, Plum Creek shall contain or minimize the source of emissions (e.g., sweep up the material, cover the material, or use water or chemical treatment to minimize the fugitive emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Plum Creek shall take precautions to avoid creating a water quality problem from surface water runoff. Conducting a visual survey does not relieve Plum Creek of a liability for a violation determined using Reference Method 9.
- N.4. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

- N.5. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.N.2. The test methods shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

### **Recordkeeping**

- N.6. Each log entry shall include: date; time; observer; observation point; observation location; ambient conditions including, but not limited to approximate wind speed; wind direction; cloud cover; and results of the visual surveys. If any corrective action is required, the time, date, and any preventive or corrective action taken should be recorded in the log.

### **Reporting**

- N.7. The Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- N.8. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- Verification that the visual surveys were performed and logged as specified by Section III.N.3;
  - Verification that a log of corrective actions was maintained as specified by Section III.N.6;
  - Identification of any instances of excessive fugitive emissions noted during the monthly checks and the corrective action taken; and
  - The results of any Method 9 test conducted during the period. The actual test report need only be submitted to the Department upon request as specified by Section III.N.7.

## **O. Plywood Presses**

### **P16 - Plywood Presses**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
O.1, O.2, O.3, O.4	Opacity	20%	Method 9	Semiannually	Semiannually

### **Conditions**

- O.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the plywood presses that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

### **Compliance Demonstration**

- O.2. Every 6 months a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

## Recordkeeping

- O.3. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.

## Reporting

- O.4. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports must provide the results of the Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.O.3.

## P. Plywood Material Handling Baghouses and Cyclones

**P19 - Plywood Sander Baghouse; P20 - Plywood 18" Trim Baghouse; P21 - Plywood 30" Trim Baghouse; and P23 - Plywood Chip Bin Cyclone**

Permit Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
P.1, P.3, P.6, P.9	Opacity	20%	Method 9	Semiannually	Semiannually
			Method 5	As Required by the Department	
P.2, P.4, P.5, P.7, P.8, P.9	PM <sub>10</sub>	See Table P.2.	Method 201A	As Required by the Department	Semiannually

## Conditions

- P.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- P.2. Plum Creek shall comply with the emission limitations contained in Table P.2 (ARM 17.8.710 and ARM 17.8.715).

Table P.2		
Emissions Unit	Total Particulate Emissions Limit	PM10 Emissions Limit
P19 Plywood Sander Dust Baghouse	1.35 lb/hr	1.35 lb/hr
P20 Plywood 18" Trim Hog Baghouse	0.58 lb/hr	0.58 lb/hr
P21 Plywood 30" Trim Hog Baghouse	0.58 lb/hr	0.58 lb/hr
P23 Plywood Chip Bin Cyclone	1.30 lb/hr	0.52 lb/hr

## Compliance Demonstration

- P.3. Every 6 months a Method 9 test must be performed on each baghouse and cyclone listed above in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.



- P.4. For monitoring pertaining to the particulate emission limits, each Plywood Material Handling Baghouse and Cyclone must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- P.5. As required by the Department, Plum Creek shall perform a Method 5 test and a Method 201A or other approved test to monitor compliance with the emissions limit in Section III Table P.2. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.

### Recordkeeping

- P.6. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- P.7. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Major maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

### Reporting

- P.8. The Method 5 and Method 201A test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- P.9. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- Provide the results of the semiannual Method 9 tests; the actual test report must be submitted to the Department upon request as specified by Section III.P.6;
  - Verification of whether the Plywood Material Handling baghouses and cyclone were inspected and maintained as required by Section III.P.4, and provide a summary of the results of the inspections and any maintenance activity or preventive action taken for any Plywood Material Handling baghouses and cyclone;
  - The results of any required Method 5 or Method 201A source tests during the reporting period in which it is conducted; the actual test reports must be submitted as specified by Section III.P.8.

### Q. Plywood Veneer Dryers

#### P22 Veneer Dryers and P14 Veneer Dryers, roof vents at feed point

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
Q.1, Q.6, Q.10, Q.14	Opacity	20%	Method 9	Semiannually	Semiannually
Q.2, Q.7, Q.13, Q.14	Particulate Matter	10.00 lb/hr	Method 5	Every 3 Years	Semiannually
Q.3, Q.7, Q.13, Q.14	PM <sub>10</sub>	10.00 lb/hr	Method 201A	Every 3 Years	Semiannually
Q.4, Q.8, Q.11, Q.14	Sulfur in Fuel (liquid or solid fuels)	<1lb S/MMBtu fired	Record-keeping	As necessary	Semiannually
Q.5, Q.9, Q.12, Q.14	ESP	----	Operate, Inspect & Maintain	Ongoing, Semiannually As Necessary	Semiannually

## **Conditions**

- Q.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any the veneer dryers that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- Q.2. Plywood veneer dryer emissions of total particulate shall be limited to 10.00 lb/hr (ARM 17.8.710).
- Q.3. Plywood veneer dryer emissions of PM<sub>10</sub> shall be limited to 10.00 lb/hr (ARM 17.8.710).
- Q.4. Plum Creek shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million Btu fired (ARM 17.8.322(4)).
- Q.5. Plum Creek shall operate and maintain the ESP on the veneer dryer (ARM 17.8.710).

## **Compliance Demonstration**

- Q.6. Every 6 months a Method 9 test must be performed on the P22 Veneer Dryer stack and the P14 Veneer Dryers, roof vents at feed point in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- Q.7. A source test shall be required on the P22 Veneer Dryer stack and compliance demonstrated with the limitation contained in Sections III.Q.2 and 3. The testing shall continue on an every-3-year basis to monitor compliance with the emission limitations contained in Sections III.Q.2 and 3. The source test methods shall conform to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.
- Q.8. Plum Creek shall burn only wood waste in the Wellons Wood Waste Burner, which supplies heat to the Plywood Veneer Dryers.
- Q.9. Plum Creek shall perform at least semiannual inspections on the ESP and the Plywood Veneer Dryers. The inspections should be conducted in accordance with the manufacturer's maintenance recommendations.

## **Recordkeeping**

- Q.10. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- Q.11. Plum Creek shall record in a log anytime material other than wood waste is burned in the Wellons wood waste burner. The log must include the date, time, material, and quantity of material fed into the burner. The log must be maintained on-site and must be submitted to the Department upon request.
- Q.12. Plum Creek shall maintain a log to record the semiannual maintenance inspections of the ESP on the Plywood Veneer Dryers. Each log entry must include the date, time, ESP identification, observer's initials and results of the inspection. Major maintenance activity or any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

## Reporting

- Q.13. The source test report(s) shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- Q.14. The annual compliance certification report required by Section V.B must contain a certification statement for the above applicable requirements. The semiannual compliance monitoring reports shall provide the following:
- Results of the Method 9 test; the actual test report must be submitted to the Department upon request as specified by Section III.Q.10;
  - Results of the required source tests must be included in the reporting period in which it is performed; the actual test report must be submitted as specified by Section III.Q.13;
  - Verification of whether the ESP was operated and maintained as required by Section III.Q.5 and 9 and provide a summary of the results of the inspections and any maintenance activity or preventive action taken; and
  - Verification of whether any material other than wood-waste was combusted in the Wellons Wood Waste Burner and provides a summary of material combusted during the reporting period as specified by Section III.Q.11.

## R. Outside Sawmill Process and Material Handling Fugitive Emissions

### S02 - Chop Saws; S05 - Sawdust Truck Bin Loadout; and S08 - Planer Shavings Truck Bin Loadout

Permit Condition(s)	Pollutant Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
R.1, R.3, R.4, R.6, R.7, R.8	Opacity	20%	Visual Surveys	Monthly	Semiannually
			Method 9	As Required by the Department	Semiannually
R.2, R.5, R.7, R.8	Particulate Matter, Industrial Processes	$E = 4.10 * P^{0.67}$	Method 5	As Required by the Department	Semiannually

## Conditions

- R.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- R.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 4.10 * P^{0.67}$ , where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour (ARM 17.8.310).

## Compliance Demonstration

- R.3 At least monthly, Plum Creek shall visually survey the above sources for excessive fugitive emissions. For the purpose of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the survey does not have to be EPA Reference Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including the proper location to observe visible emissions. The

person conducting the survey shall record the results of the survey in the log. If sources of excessive fugitive emissions are identified, Plum Creek shall contain or minimize the source of emissions (e.g., sweep up the material, cover the material, or use water or chemical treatment to minimize the fugitive emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Plum Creek shall take precautions to avoid creating a water quality problem from surface water runoff. Conducting a visual survey does not relieve Plum Creek of a liability for a violation determined using Reference Method 9.

- R.4. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- R.5. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.R.2. The test methods shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

### Recordkeeping

- R.6. Each log entry shall include: date; time; observer; observation point; observation location; ambient conditions including but not limited to approximate wind speed; wind direction; cloud cover; and results of the visual surveys. If any corrective action is required, the time, date, and any preventive or corrective action taken should be recorded in the log.

### Reporting

- R.7. The Method 5 and Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- R.8. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide the following:
- Verification that the visual surveys were performed and logged as specified by Section III.R.3;
  - Verification that a log of corrective actions was maintained as specified by Section III.R.6;
  - Identification of any instances of excessive fugitive emissions noted during the monthly checks and the corrective action taken;
  - The results of any Method 9 or Method 5 test conducted during the period. The actual Method 9 test reports need only be submitted to the Department upon request as specified by Section III.R.7.

## S. Lumber Drying

### S10 - Lumber Drying Kilns

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
S.1, S.3, S.4, S.5, S.6	Opacity	20%	Method 9	Semiannually	Semiannually
S.2, S.4, S.6	Particulate Matter, Industrial Processes	$E = 55 * P^{0.11} - 40$	Method 5	As Required by the Department	Semiannually

## Conditions

- S.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- S.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 55.0 * P^{0.11} - 40$ , where E is the emissions in pounds per hour and P is the process weight in tons per hour (ARM 17.8.310).

## Compliance Demonstration

- S.3. Every 6 months a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- S.4. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.S.2. The test methods shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

## Recordkeeping

- S.5. Method 5 and Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.

## Reporting

- S.6. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall address the results of the Method 5 and Method 9 test; the actual test report must be submitted to the Department only upon request as specified by Section III.S.5.

## T. Sawmill Material Handling Cyclones

**S12 - Planer #3 Cyclone; S13 - Planer #4 Cyclone; S14 - Planer Shavings Truck Bin Cyclone; S15 - Planer Chip Truck Bin Cyclone; S16 - Sawmill Chip Bin Cyclone; and S17 - Sawmill Sawdust Target Box**

Permit Condition(s)	Pollutant/Parameters	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
T.1, T.3, T.6, T.9,	Opacity	20%	Method 9	Semiannually	Semiannually
T.2, T.4, T.5, T.7, T.8, T.9	Particulate Matter	See Table T.2.	Operation and maintenance	Whenever process equipment is operating	Semiannually
			Method 5	As Required by the Department	Semiannually
			Method 201A	As Required by the Department	Semiannually

## Conditions

- T.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- T.2. Plum Creek shall comply with the emission limitations contained in Table T.2 (ARM 17.8.710).

Table T.2		
Emissions Unit	Total Particulate Emissions Limit	PM <sub>10</sub> Emissions Limit
S12 - Planer #3 Cyclone	5.55 lb/hr	2.22 lb/hr
S13 - Planer #4 Cyclone	13.90 lb/hr	5.55 lb/hr
S14 - Planer Shavings Truck Bin Cyclone	1.39 lb/hr	0.56 lb/hr
S15 - Planer Chip Truck Bin Cyclone	1.39 lb/hr	0.56 lb/hr
S16 - Sawmill Chip Bin Cyclone	1.39 lb/hr	0.56 lb/hr

## Compliance Demonstration

- T.3. Every 6 months a Method 9 test must be performed on each Sawmill Material Handling Cyclone in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. The Method 9 test must be used to monitor compliance with the 20% opacity limit. Each observation period shall be a minimum of 6 minutes unless any one reading is greater than 20%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.
- T.4. For monitoring pertaining to the particulate emission limits, each Sawmill Material Handling Cyclone must be inspected at least semiannually for wear, plugging, abrasion, and general integrity of the control device.
- T.5. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.T.2. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). The Department may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM<sub>10</sub>.

## Recordkeeping

- T.6. Method 9 test reports shall be maintained on-site and must be submitted to the Department upon request.
- T.7. Plum Creek shall maintain a log to verify that the semiannual maintenance inspections were performed. Each log entry must include the date, time, observer's initials, and results of the inspection. Maintenance activity of any preventive or corrective action taken for each control device must be recorded in the maintenance log. The log must be maintained on-site and must be submitted to the Department upon request.

## Reporting

- T.8. The Method 5 and Method 201A source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.

- T.9. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- The results of the semiannual Method 9 tests; the actual test report must be submitted to the Department only upon request as specified by Section III.T.6;
  - Verification of whether the Sawmill Material Handling cyclones were inspected and maintained as required by Section III.T.4, and provide a summary of the results of the inspections and any maintenance activity or preventive action taken for any Sawmill Material Handling cyclone; and
  - The results of any required Method 5 source tests during the reporting period in which it is performed; the actual test reports must be submitted as specified by Section III.T.8.

**U. Fugitive Emissions: Vehicle Traffic**

**F01 Vehicle Activity**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
U.1, U.3, U.5, U.6, U.7, U.8	Opacity	20%	Visual Surveys	Once per Calendar Week	Semiannually
			Method 9	As Required by the Department	Semiannually
U.1, U.2, U.3, U.4, U.5, U.6, U.7, U.8	Opacity	Reasonable Precaution	Water/Chemical Suppressants	As Necessary	Semiannually

**Conditions**

- U.1. Plum Creek shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.308 (1)).
- U.2. Plum Creek shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308(2)).

**Compliance Demonstration**

- U.3. Once per calendar week during daylight hours, Plum Creek shall visually survey vehicular traffic on paved and unpaved roads for any sources of excessive fugitive emissions. For the purpose of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. If sources of excessive fugitive emissions are identified, Plum Creek shall contain or minimize the source of emissions by using water or some chemical treatment to minimize the fugitive emissions, unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Plum Creek shall take precautions to avoid creating a water quality problem from surface water runoff.

- U.4. Plum Creek shall treat all unpaved portions of the haul roads, access roads, parking lots, and general plant area with water and/or chemical dust suppressants as necessary to monitor compliance with ARM 17.8.308. Chemical dust suppressants shall be applied to the major roads on the log yard and major haul routes throughout the plant to control fugitive dust from all log handling equipment and to control fugitive dust from the haul trucks. The application schedule shall be no less than once per year. Water sprays shall be used as necessary to control dust emissions on active areas of the log yard (ARM 17.8.710).
- U.5. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

### Recordkeeping

- U.6. Plum Creek shall maintain a log to verify that the visual surveys were performed as specified in Section III.U.4. Each log entry must include the date, time, and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log. When water and chemical dust suppressants or water sprays are used to control fugitive dust emissions, the log must include what was applied, a description of the area of application, and the amount of application (gallons). The log must be maintained on-site and must be submitted to the Department upon request.

### Reporting

- U.7. The Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- U.8. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall provide:
- Verification that the visual surveys were performed once per calendar week and logged as required by Section III.U.4 and 5; and
  - A summary of the results of the visual surveys and provide a summary of any preventive or corrective action taken to control fugitive dust emissions.

## V. Hog Boiler Fuel Handling & Storage

### F04 - Hog Boiler Fuel Handling & Storage

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
V.1, V.3, V.4, V.7, V.8	Opacity	20%	Visual Surveys	Once per Calendar Week	Semiannually
			Method 9	As Required by the Department	Annual Certification
V.1, V.3, V.6, V.8	Opacity	Reasonable Precaution	Corrective Actions	As Necessary	Semiannually
V.2, V.5, V.7, V.8	Particulate Matter, Industrial Processes	$E=4.10 * P^{0.67}$	Method 5	As Required by the Department	Annual Certification



## Conditions

- V.1. Plum Creek shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).
- V.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 4.10 * P^{0.67}$ , where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour (ARM 17.8.310).

## Compliance Demonstration

- V.3. Once per calendar week during daylight hours, Plum Creek shall visually survey the outside storage pile and enclosed bunker for any sources of excessive fugitive emissions. For the purpose of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. If sources of excessive fugitive emissions are identified, Plum Creek shall contain or minimize the source of emissions (e.g., sweep up the material, cover the material, or use water or chemical treatment to minimize the fugitive emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Plum Creek shall take precautions to avoid creating a water quality problem from surface water runoff.
- V.4. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
- V.5. As required by the Department, Plum Creek shall perform a Method 5 test or other approved test to monitor compliance with the particulate emissions limit in Section III.V.2. The test methods shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

## Recordkeeping

- V.6. Plum Creek shall maintain a log to verify that the visual surveys were performed as specified in Section III.V.3. Each log entry must include the date, time, and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log. The log must be maintained on-site and must be submitted to the Department upon request.

## Reporting

- V.7. The Method 5 and Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.
- V.8. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirements. The semiannual compliance monitoring reports shall address:
  - a. Verification that the visual surveys were performed and logged as specified by Section III.V.3 and provide the results of any required Method 9 test; and

- b. Verification that a log of corrective actions was maintained as specified by Section III.V.6. and provide a summary of any preventive or corrective action taken to control fugitive emissions.

**W. Miscellaneous Emissions Sources**

**H04 - Wood Grain Ink and H05 PMA Glycol Ether Solvent**

Permit Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
W.1, W.2, W.3, W.4	Opacity	20%	Method 9	As Required by thte Department	Semiannual

**Conditions**

- W.1. Plum Creek shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

**Compliance Demonstration**

- W.2. As required by the Department, a Method 9 test shall be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

**Recordkeeping**

- W.3. The Method 9 source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual.

**Reporting**

- W.4. The annual compliance certification reports must contain a certification stating whether Plum Creek is in compliance with the above applicable requirement. The semiannual compliance monitoring reports must provide the results of any Method 9 test performed.

## SECTION IV - NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emissions unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude the need to comply with any new requirement that may become applicable during the permit term.

### A. Facility-Wide

State	Rule Citation		Reason
	State	Federal	
		40 CFR 60, Subparts D, Da, Db, and Dc; 40 CFR 60, Subpart E; 40 CFR 60, Subpart K, Ka, and Kb; and 40 CFR 61, Subpart J.	These requirements are not applicable because this facility is not an "affected facility" under these regulations.
		40 CFR 60 (Except Subpart A and appendices), 40 CFR 61 (Except subpart A, subpart M and appendices) and 40 CFR 63 (Except Subpart A and appendices), and 40 CFR 82 (Except subparts B&F).	These requirements are not applicable because the facility is not an affected source under these regulations.
ARM 17.8.321, ARM 17.8.323, ARM 17.8.331, ARM 17.8.332, ARM 17.8.333, and ARM 17.8.334.			These rules are not applicable because the facility is not listed in the source category cited in the rules.
ARM 17.8.316, ARM 17.8.320, and			These rules are not applicable because the facility does not have the specific emissions unit cited in the rules.

### B. Emissions Unit Nonapplicable Requirements

Emissions Unit ID	RULE CITATION		REASON
	State	Federal	
B01		40 CFR 60, Subpart D	This boiler does not fire fossil fuels.
B01		40 CFR 60, Subpart Db	This boiler was constructed in 1973 prior to the June 19, 1984 rule date.
B02		40 CFR 60, Subpart Dc	This boiler was constructed in 1967 prior to the June 9, 1989 rule date.
B04		40 CFR 60, Subpart Dc	This boiler was constructed in 1954 prior to the June 9, 1989 rule date.

## SECTION V - GENERAL PERMIT CONDITIONS

### A. COMPLIANCE REQUIREMENTS

ARM 17.8 Subchapter 12 Operating Permit Program §1210 (2)(a)-(c)&(e), §1206(6)(c) and §1206(6)(b)

1. The permittee must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.
2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for noncompliance with an applicable requirement if the source demonstrates both that the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety, or environmental impacts were unforeseeable and could not have otherwise been avoided.
4. The permittee shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of the permittee to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.
5. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

### B. CERTIFICATION REQUIREMENTS

ARM 17.8 Subchapter 12 Operating Permit Program §1207, and §1213 (7)(a)&(c)-(d)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

2. Compliance certifications shall be submitted by January 31 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 - December 31).
3. Compliance certifications shall include the following:
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;
  - c. The status of compliance with each term and condition for the period covered by the certification, *including whether compliance during the period was continuous or intermittent* (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and
  - d. Such other facts as the Department may require to determine the compliance status of the source.
4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

**C. PERMIT SHIELD**

ARM 17.8 Subchapter 12 Operating Permit Program §1214 (1)-(4)

1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a concise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.
2. The permit shield described in 1. above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, revocation or reissuance) to the Board of Environmental Review (Board) until such time as the board renders its final decision.
3. Nothing in this permit alters or affects the following:
  - a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under that section.
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
  - c. The applicable requirements of the acid rain program, consistent with Sec. 7651g (a) of the FCAA.
  - d. The ability of the administrator to obtain information from a source pursuant to sec. 7414 of the FCAA;

- e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, chapter 2, MCA;
  - f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, chapter 2, MCA.
  - g. The ability of the Department to establish or revise requirements for the use of Reasonably Available Control Technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12 is appealed to the Board, the permit shield, as it applies to the source's existing permit, shall remain in effect until such time as the Board has rendered its final decision.
- 4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation of an applicable requirement or permit term demonstrated pursuant to ARM 17.8.106, Source Testing Protocol.
  - 5. Pursuant to ARM 17.8.132, for the purpose of submitting a compliance certification, nothing in these rules shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance. However, when compliance or noncompliance is demonstrated by a test or procedure provided by permit or other applicable requirements, the source shall then be presumed to be in compliance or noncompliance unless that presumption is overcome by other relevant credible evidence.
  - 6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see sections I & J).
  - 7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see sections K & N).

**D. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

**ARM 17.8 Subchapter 12 Operating Permit Program §1212 (2)&(3)**

- 1. Unless otherwise provided in this permit, the permittee shall maintain compliance monitoring records that include the following information:
  - a. The date, place as defined in the permit, and time of sampling or measurements
  - b. The date(s) analyses were performed
  - c. The company or entity that performed the analyses
  - d. The analytical techniques or methods used
  - e. The results of such analyses
  - f. The operating conditions at the time of sampling or measurement
- 2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation,

and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in a computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be retained in their original form at the plant site and shall be made available to Department personnel upon request.

3. The permittee shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by January 31 and July 31 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted, on January 31 of each year, must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted, on July 31 of each year, must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207

**E. PROMPT DEVIATION REPORTING**

ARM 17.8 Subchapter 12 Operating Permit Program §1212 (3)(c)

The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be reported as part of the routine reporting requirements under ARM 17.8.1212(3)(b), and if applicable, in accordance with the malfunction reporting requirements under ARM 17.8.110, unless otherwise specified in an applicable requirement.

**F. EMERGENCY PROVISIONS**

ARM 17.8 Subchapter 12 Operating Permit Program §1201(13) and §1214 (5),(6)&(8)

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventative maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency
  - b. The permitted facility was at the time being properly operated
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit

- d. The permittee submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken
3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

**G. INSPECTION AND ENTRY**

ARM 17.8 Subchapter 12 Operating Permit Program §1213(3)&(4)

1. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department, the administrator or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:
  - a. Enter the premises where a source required to obtain a permit is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
  - c. Inspect at reasonable times any facilities, emission unit, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor at reasonable times any substances or parameters at any location for the purpose of assuring compliance with the permit or applicable requirements.
2. The permittee shall inform the inspector of all applicable workplace safety rules or requirements at the time of the inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

**H. FEE PAYMENT**

ARM 17.8 Subchapter 12 Operating Permit Program §1210(2)(f), 17.8 Subchapter 5 Air Quality Permit Application, Operation and Open Burning Fees §505 (3)-(5) (STATE ONLY)

1. The permittee must pay application and operating fees, pursuant to ARM Title 17, Chapter 8, Subchapter 5.
2. Annually, the Department shall provide the permittee with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after completion of an appeal, is due immediately upon issuance of the board's decision or upon completion of any judicial review of the Board's decision.
3. If the permittee fails to pay the required fee (or any required portion of an appealed fee) within 90 days after the due date of the fee, the Department may impose additional assessment of 15% of the fee (or any required portion of an appealed fee) or \$100,



whichever is greater, plus interest on the fee (or any required portion of an appealed fee) computed at the interest rate established under 15-31-510(3), MCA.

**I. MINOR PERMIT MODIFICATIONS**

ARM 17.8 Subchapter 12 Operating Permit Program §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.
2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

**J. CHANGES NOT REQUIRING PERMIT REVISION**

ARM 17.8 Subchapter 12 Operating Permit Program §1224 (1)-(3),(5)&(6)

1. The permittee is authorized to make changes within the facility as described below, providing the following conditions are met.
  - a. The proposed changes do not require the permittee to obtain an air quality preconstruction permit under ARM Title 17, Chapter 8, Subchapter 7;
  - b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9 or 10.
  - c. The emissions resulting from the proposed changes do not exceed the emissions allowable under this permit, whether expressed as a rate of emissions, or in total emissions.
  - d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emissions units covered by the permit.
  - e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes.
2. The permittee and Department shall attach each notice provided pursuant to 1.e, above, to their respective copies of this permit.
3. Pursuant to the conditions above, the permittee is authorized to make sec. 502(b)(10) changes, as defined in ARM Title 17, Chapter 8, Subchapter 12, without a permit revision. For each such change, the written notification required under 1.e above, shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
4. The permittee may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the following conditions are met:
  - a. Each proposed change does not weaken the enforceability of any existing permit conditions.
  - b. The Department has not objected to such change.

- c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition.
  - d. The permittee provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and ARM 17.8.1224(5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

**K. SIGNIFICANT PERMIT MODIFICATIONS**

ARM 17.8 Subchapter 12 Operating Permit Program §1227(1),(3)&(4)

- 1. The modification procedures set forth in 2. below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:
  - a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment
  - b. Every significant change in existing permit monitoring terms or conditions
  - c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to determine compliance with any applicable rule, consistent with the requirements of the rule
  - d. Any other change determined by the Department to be significant
- 2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion.
- 3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

**L. REOPENINGS FOR CAUSE**

ARM 17.8 Subchapter 12 Operating Permit Program §1228(1)&(2)

- 1. This permit may be reopened and revised under the following circumstances:
  - a. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of three or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable requirement is later than the date on which the permit is due to expire, unless the original permit or

any of its terms and conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2).

- b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- c. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- d. The administrator or the Department determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

**M. PERMIT EXPIRATION AND RENEWAL**

ARM 17.8 Subchapter 12 Operating Permit Program §1210(2)(g), §1220(11)&(12), §1205(2)(d)

- 1. This permit is issued for a fixed term of five years.
- 2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for applications, content, public participation, and affected state and administrator review.
- 3. Expiration of this permit terminates the permittee's right to operate unless a timely and administratively complete permit renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.
- 4. For renewal, the permittee shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify in writing to the permittee a longer time period for submission of the renewal application. Such written notification must be provided at least one year before the renewal application due date established in the existing permit.

**N. SEVERABILITY CLAUSE**

ARM 17.8 Subchapter 12 Operating Permit Program §1210(2)(i)&(l)

- 1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply to the source as if a final permit decision had not been reached by the Department.
- 2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in 1 or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

**O. TRANSFER OR ASSIGNMENT OF OWNERSHIP**

ARM 17.8 Subchapter 12 Operating Permit Program §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage, and liability between the current and new permittee.
2. The permit shield provided for in ARM 17.8.1214 shall extend to administrative permit amendments.

**P. EMISSIONS TRADING, MARKETABLE PERMITS, ECONOMIC INCENTIVES**

ARM 17.8 Subchapter 12 Operating Permit Program §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana state implementation plan or in applicable requirements promulgated by the administrator.

**Q. NO PROPERTY RIGHTS CONVEYED**

ARM 17.8 Subchapter 12 Operating Permit Program §1210 (2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

**R. TESTING REQUIREMENTS**

ARM 17.8 Subchapter 1 General Provisions §105

The permittee shall comply with ARM 17.8.105.

**S. SOURCE TESTING PROTOCOL**

ARM 17.8 Subchapter 1 General Provisions §106

The permittee shall comply with ARM 17.8.106.

**T. MALFUNCTIONS**

ARM 17.8 Subchapter 1 General Provisions §110

The permittee shall comply with ARM 17.8.110.

**U. CIRCUMVENTION**

ARM 17.8 Subchapter 1 General Provisions §111

The permittee shall comply with ARM 17.8.111.

**V. MOTOR VEHICLES**

ARM 17.8 Subchapter 3 Emission Standards §325

The permittee shall comply with ARM 17.8.325.

**W. ANNUAL EMISSIONS INVENTORY**

17.8 Subchapter 5 Air Quality Permit Application, Operation and Open Burning Fees §505 (STATE ONLY)

The permittee shall supply the Department with annual production and other information for all emissions units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

**X. OPEN BURNING**

ARM 17.8 Subchapter 6 Open Burning §604, 605 and 606

The permittee shall comply with ARM 17.8.604, 605, and 606.

**Y. PRECONSTRUCTION PERMITS**

ARM 17.8 Subchapter 7 Permit, Construction and Operation of Air Contaminant Sources §745 and 764 (ARM 17.8 745(1) and 764(l)(b) are STATE ENFORCEABLE ONLY until approved by EPA as part of SIP)

1. Except as specified, no person shall construct, install, alter, or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.744 (1)(a) - (k).
2. The permittee shall comply with ARM 17.8.743, 744, 745, 748, and 764.
3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding an air quality preconstruction permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 15 tons per year of any pollutant, except (STATE ENFORCEABLE ONLY until approved by the EPA as part of the SIP):
  - a. Any construction or changed condition that would violate any condition in the facility's existing air quality preconstruction permit or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2).
  - b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9 or 10 of Chapter 8.
  - c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804.
  - d. Any construction or improvement project with a potential to emit more than 15 tons per year may not be artificially split into smaller projects to avoid air quality preconstruction permitting.
  - e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.
4. A facility making a de minimis change pursuant to ARM 17.8.745(1) shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a

new emission unit. The notice must be submitted, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l). (STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP).

**Z. NATIONAL EMISSION STANDARD FOR ASBESTOS**

40 CFR Part 61, Subpart M

The permittee shall not conduct any asbestos abatement activities except in accordance with 40 CFR Part 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

**AA. ASBESTOS**

ARM 17.74 Subchapter 3 General Provisions and Subchapter 4 Fees

The permittee shall comply with ARM 17.74.301, *et seq.* and ARM 17.74.401, *et seq.* (State only)

**BB. STRATOSPHERIC OZONE PROTECTION - SERVICING OF MOTOR VEHICLE AIR CONDITIONERS**

40 CFR Part 82, Subpart B

If the permittee performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B.

**CC. STRATOSPHERIC OZONE PROTECTION - RECYCLING AND EMISSIONS REDUCTIONS**

40 CFR Part 82, Subpart F

The permittee shall comply with the standards for recycling and emissions reduction in 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B.

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.
4. Persons disposing of small appliances, MVACs, and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166.
5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

**DD. EMERGENCY EPISODE PLAN**

The permittee shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region, shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department, following Priority I reclassification.

**EE. DEFINITIONS**

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit shall have the meaning assigned to them in the referenced regulations.

# APPENDICES



## Appendix. A INSIGNIFICANT EMISSION UNITS

**Disclaimer:** The information in this appendix is not State or Federally enforceable but is presented to assist Plum Creek, permitting authority, inspectors, and the public.

### List of Insignificant Activities:

The following table of insignificant sources and/or activities was provided by Plum Creek to assist in understanding the facility's layout. Because there are no requirements to update such a list, the emissions units and/or activities may change from those specified in the table.

Insignificant Activities and Emissions Units	
Emission Unit ID	Description
F02	Rail Activity
F03	Landfill Activity
H01	Gasoline Fueling Tanks
H02	Diesel Fueling Tanks
H03	Propane Fueling Tanks
H06	Machine Shop - Parts Washer
M12	MDF Reject Fiber Cyclone & Baghouse
M26	MDF Fire Dump Cyclone (emergency only)
M27	MDF Ammonia Treatment Stack
M28	MDF Building Fugitives
P01	Log Debarker
P03	Bark Hog (Wet)
P09	Wet Fuel Silo
P10	Dry Fuel Silo
P11	Emergency Fuel Pile
P12	Woodwaste Chipper
P15	Plywood Building
P24	Plywood Fines Bin Target Box
S01	Log Debarker
S03	Bark Hog (wet)
S04	Sawmill Chip Truck Bin Loadout
S06	Hog Fuel Truck Bin Loadout
S07	Planer Chip Truck Bin Loadout
S09	Sawmill Bldg. Saws
S11	Planer Building, Saws
S17	Sawmill Sawdust Bin Cyclone



## Appendix. B DEFINITIONS and ABBREVIATIONS

### Definitions:

**"Administrative permit amendment"** means an air quality operating permit revision that:

- (a) Corrects typographical errors;
- (b) Identifies a change in the name, address, or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source;
- (c) Requires more frequent monitoring or reporting by Plum Creek;
- (d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements;
- (e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225; or
- (f) Incorporates any other type of change which the Department has determined to be similar to those revisions set forth in (a)-(e), above.

**"Applicable requirement"** means all of the following as they apply to emissions units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rulemaking at the time of issuance of the air quality operating permit, but have future-effective compliance dates, provided that such requirements apply to sources covered under the operating permit):

- (a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana state implementation plan approved or promulgated by the administrator through rulemaking under Title I of the FCAA;
- (b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under ARM Title 17, Chapter 8, Subchapters 7, 8, 9, and 10, or pursuant to regulations approved or promulgated through rulemaking under Title I of the FCAA, including parts C and D;
- (c) Any standard or other requirement under sec. 7411 of the FCAA, including sec. 7411(d);
- (d) Any standard or other requirement under sec. 7412 of the FCAA, including any requirement concerning accident prevention under sec. 7412(r)(7), but excluding the contents of any risk management plan required under sec. 7412(r);
- (e) Any standard or other requirement of the acid rain program under Title IV of the FCAA or regulations promulgated thereunder;
- (f) Any requirements established pursuant to sec. 7661c(b) or sec. 7414(a)(3) of the FCAA;

- (g) Any standard or other requirement governing solid waste incineration, under sec. 7429 of the FCAA;
- (h) Any standard or other requirement for consumer and commercial products, under sec. 7511b(e) of the FCAA;
- (i) Any standard or other requirement for tank vessels, under sec. 7511b(f) of the FCAA;
- (j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit;
- (k) Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to sec. 7661c(e) of the FCAA; or
- (l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under ARM Title 17, Chapter 8, Subchapter 6.

**"Department"** means the Montana Department of Environmental Quality.

**"Emissions unit"** means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under sec. 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

**"EPA Method 9 qualified observer"** means an observer that has been tested and demonstrated the ability to assign opacity readings in accordance with 40 CFR 60 Appendix A - Test Methods section 3 of Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources.

**"FCAA"** means the Federal Clean Air Act, as amended.

**"Federally enforceable"** means all limitations and conditions which are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana state implementation plan, and any permit requirement established pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA-approved program that is incorporated into the Montana state implementation plan and expressly requires adherence to any permit issued under such program.

**"Fugitive emissions"** mean those emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

**"General air quality operating permit"** or "general permit" means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

**"Hazardous air pollutant"** means any air pollutant listed as a hazardous air pollutant pursuant to sec. 112(b) of the FCAA.

**"Non-federally enforceable requirement"** means the following as they apply to emissions units in a source requiring an air quality operating permit:

- (a.) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rulemaking under Title I of the FCAA;

- (b.) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under ARM Title 17, Chapter 8, Subchapters 7, 8, 9, and 10 that is not federally enforceable;
- (c.) Does not include any Montana ambient air quality standard contained in ARM Title 17, Chapter 8, Subchapter 2.

**"Permittee"** means the owner or operator of any source subject to the permitting requirements of ARM Title 17, Chapter 8, Subchapter 12, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to ARM Title 17, Chapter 8, Subchapter 12.

**"Regulated air pollutant"** means the following:

- (a) Nitrogen oxides or any volatile organic compounds;
- (b) Any pollutant for which a national ambient air quality standard has been promulgated;
- (c) Any pollutant that is subject to any standard promulgated under sec. 7411 of the FCAA;
- (d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA; or
- (e) Any pollutant subject to a standard or other requirement established or promulgated under sec. 7412 of the FCAA, including but not limited to the following:
  - (i) Any pollutant subject to requirements under sec. 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established pursuant to sec. 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established pursuant to sec. 7412(e) of the FCAA; and
  - (ii) Any pollutant for which the requirements of sec. 7412(g)(2) of the FCAA have been met, but only with respect to the individual source subject to the sec. 7412(g)(2) requirement.

**"Responsible official"** means one of the following:

- (a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
  - (ii) The delegation of authority to such representative is approved in advance by the Department.
- (b) For a partnership or sole proprietorship: a general partner or the proprietor, respectively.

- (c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the environmental protection agency).
- (d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under ARM Title 17, Chapter 8, Subchapter 12.

"Year" means any twelve consecutive months.

#### Abbreviations:

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
Btu	British Thermal Unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Montana Department of Environmental Quality
dscf	dry standard cubic foot
dscfm	dry standard cubic foot per minute
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
EU	emissions unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
IEU	insignificant emissions unit
Mbdft	thousand board feet
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
Method 201A	40 CFR 51, Appendix M, Method 201A
MMbdft	million board feet
MMBtu	million British thermal units
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	oxides of nitrogen
O <sub>2</sub>	oxygen
Pb	lead
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 microns in size
psi	pounds per square inch
scf	standard cubic feet
SIC	Source Industrial Classification
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	oxides of sulfur
tpy	tons per year
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

## **Appendix. C NOTIFICATION ADDRESSES**

### **Compliance Notifications:**

Montana Department of Environmental Quality  
Permitting and Compliance Division  
Air & Waste Management Bureau  
P.O. Box 200901  
Helena, MT 59620-0901

U.S. EPA Region VIII, Montana Office  
ATTN: Air Program Coordinator  
Federal Office Building  
10 West 15th Street, Suite 3200  
Helena, MT 59626

### **Permit Modifications:**

Montana Department of Environmental Quality  
Permitting and Compliance Division  
Air & Waste Management Bureau  
P.O. Box 200901  
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance  
Air and Radiation Program  
US EPA Region VIII 8P-AR  
999 18th Street, Suite 500  
Denver, Colorado 80202-2466





## **Appendix. D AIR QUALITY INSPECTOR INFORMATION**

**Disclaimer:** The information in this appendix is not State or Federally enforceable but is presented to assist Plum Creek, permitting authority, inspectors, and the public

### **1. Directions to Plant:** From Kalispell, Montana

Take Highway 2 North. At the Blue Moon Restaurant Intersection turn right on Highway 2 and head toward Columbia Falls. Turn left on 12th Avenue West and proceed three blocks until reaching the cedar Plum Creek Office Building.

### **2. Safety Equipment Required:**

Plum Creek requires that inspectors comply with these general safety rules:

(1) hard hats must be worn while inspecting the facility; (2) safety glasses must be worn while inspecting the facility; and (3) all air quality inspectors must be accompanied by a Plum Creek representative during any facility inspections.

### **3. Facility Plot Plan:**

A plot plan as submitted by Plum Creek in the Title V Operating Permit Application on 7/12/95.